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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 MEDARC, LLC, as Collection Agent for
Jeffrey H. Mims, Trustee of the Liquidating
Trust of Revolution Monitoring, LLC,
10 Revolution Monitoring Management, LLC, and
Revolution Neuromonitoring, LLC,

11 Plaintiff,

12 vs.

13 UMR, INC. SUCCESSOR TO
14 COMMONWEALTH ADMINISTRATORS,
LLC, a Wisconsin limited liability company;
15 WPS, a Wisconsin corporation; CARE
IMPROVEMENT PLUS GROUP
16 MANAGEMENT, LLC, a Texas limited
liability company; TRIWEST HEALTHCARE
17 ALLIANCE CORP., an Arizona corporation;
CULINARY HEALTH FUND
18 ADMINISTRATIVE SERVICES, LLC, a
Nevada limited liability company; BOON-
19 CHAPMAN BENEFIT ADMINISTRATORS,
INC., a Texas corporation; HEALTH PLAN OF
20 NEVADA INC., a Nevada corporation;
SIERRA HEALTH AND LIFE INSURANCE
21 COMPANY, INC., a Nevada corporation;
TEACHERS HEALTH TRUST, a Nevada
22 corporation; TELLIGEN INC, an Iowa
corporation; LAS VEGAS METROPOLITAN
23 POLICE DEPARTMENT HEALTH AND
WELFARE TRUST, a Nevada corporation;
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CASE NO.: 2:21-cv-00286-GMN-NJK

STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO MOTION TO DISMISS [ECF NO.
26] (SECOND REQUEST)

SOUTHWEST SERVICE
ADMINISTRATORS INC, a Tennessee
corporation; LOOMIS BENEFITS, INC., a
Nevada corporation; DOES 1-10, inclusive; and
ROE CORPORATIONS 1-10, inclusive,

Defendants.

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN Plaintiff
MEDARC, LLC, as Collection Agent for Jeffrey H. Mims, Trustee of the Liquidating Trust of
Revolution Monitoring, LLC, Revolution Monitoring Management, LLC, and Revolution
Neuromonitoring, LLC (“Plaintiff”) and Defendant Culinary Health Fund Administrative Services,
LLC (“Defendant”) (collectively “the Parties”), by and through their undersigned counsel, to extend
the deadline for Plaintiff to respond to Defendant’s Motion to Dismiss (“Motion”) (ECF No. 26).
The current deadline for Plaintiff’s Response is April 12, 2021. On April 1, 2021, counsel for
Plaintiff filed a Motion to Withdraw as Attorney of Record. Undersigned counsel stipulates to
extend the deadline for Plaintiff’s Response to the Motion until two weeks after Plaintiff has
retained new counsel, or by April 30, 2021, whichever is sooner. This is the second stipulation for
an extension of time to respond to the Motion. This request is not intended to cause delay or
prejudice any party.

NOW, THEREFORE, IT IS STIPULATED AND AGREED by and between the Parties
that the time for Plaintiff to respond to Defendants’ Motion to Dismiss is extended to two weeks
after Plaintiff has retained new counsel, or by April 30, 2021, whichever is sooner.

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1 Dated this 12th day of April, 2021.

2 **ALDRICH LAW FIRM, LTD.**

3 /s/ John P. Aldrich

4 John P. Aldrich, Esq.

5 Nevada Bar No. 6877

6 Catherine Hernandez, Esq.

7 Nevada Bar No. 8410

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10 Telephone: (702) 853-5490

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12 *Attorneys for Plaintiff*

Dated this 12th day of April, 2021.

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

/s/ William D. Nobriga

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*Attorneys for Defendant, Culinary Health Fund
Administrative Services, LLC*

10 **ORDER**

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12 **IT IS SO ORDERED.**

13 Dated this 12 day of April, 2021.

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16 Gloria M. Navarro, District Judge
17 UNITED STATES DISTRICT COURT

18 Respectfully submitted by:

19 **ALDRICH LAW FIRM, LTD.**

20 /s/ John P. Aldrich

21 John P. Aldrich, Esq.

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